



December 30, 2020

Mr. Kevin Lawrence  
Desert View Power  
62-300 Gene Welmas Drive  
Mecca, California 92254-0758

**Subject: Quarterly CGA Units 1 and 2**  
**Report Number: W002AS-678786-RT-1614**

Dear Kevin:

This letter presents the results of the Continuous Emission Monitoring System (CEMS) quarterly test audit conducted by Dave Wonderly of Montrose Air Quality Services, LLC (MAQS) on August 21, 2020. MAQS was contracted by Desert View Power to perform this audit. The program consists of a Cylinder Gas Audit (CGA) for Units 1 and 2 on the NO<sub>x</sub>, CO, SO<sub>2</sub>, and O<sub>2</sub> monitors in accordance with 40 CFR Part 60 Appendix F Section 5.1.2.

The CGA was comprised of challenging the entire unit CEMS as close to the tip of the probe as possible with NBS traceable gases of known concentration. The gases were injected at the probe through previously installed audit ports.

Two audit gases per monitor range were selected according to the requirements of Appendix F. Each monitor was challenged by each of its two gases at three separate times. The accuracy was calculated in two ways: (1) by the percent difference between the actual known gas concentration and the average value read by the monitor; and (2) the difference in ppm from actual known gas concentration and the average value read by the monitor. Results are shown in the attached tables (Tables 1 and 2).

The results of the CGA demonstrate that the CEMS was operating within the EPA quality assurance specification of either 15% accuracy or 5 ppm difference for all parameters. All data, including gas bottle certifications and monitor response data sheets, are provided as an attachment. If you have any questions or comments, please do not hesitate to call me at (714) 279-6777.

Sincerely,

A handwritten signature in black ink that reads "Dave Wonderly".

Dave Wonderly  
Client Project Manager  
**Montrose Air Quality Services, LLC**

**TABLE 1**  
**CYLINDER GAS AUDIT RESULTS**  
**UNIT 1**  
**Desert View Power**  
**December 14, 2020**

Parameter	Accuracy, % of Gas Value	Accuracy Acceptance Criteria	Difference From Gas Value, ppm	Difference Acceptance Criteria	Status*
SO <sub>2</sub> Low Range (mid span)	-7.8%	15%	-2.13	5 ppm	Pass
SO <sub>2</sub> Low range (low span)	-1.5%	15%	-0.19	5 ppm	Pass
NO <sub>x</sub> Low range (mid span)	0.1%	15%	0.07	5 ppm	Pass
NO <sub>x</sub> Low range (low span)	5.7%	15%	1.41	5 ppm	Pass
CO Low Range (mid span)	-4.0%	15%	-2.22	5 ppm	Pass
CO Low Range (low span)	-6.2%	15%	-1.55	5 ppm	Pass
O <sub>2</sub> (mid span)	-0.7%	15%	N/A	N/A	Pass
O <sub>2</sub> (low span)	0.7%	15%	N/A	N/A	Pass
SO <sub>2</sub> High Range (mid span)	-0.5%	15%	-1.45	5 ppm	Pass
SO <sub>2</sub> High Range (low span)	4.7%	15%	5.90	5 ppm	Pass
NO <sub>x</sub> High Range (mid span)	1.6%	15%	4.64	5 ppm	Pass
NO <sub>x</sub> High Range (low span)	4.6%	15%	5.92	5 ppm	Pass
CO High Range (mid span)	0.0%	15%	-0.07	5 ppm	Pass
CO High Range (low span)	4.4%	15%	5.38	5 ppm	Pass

\* Pass if accuracy less than 15% or within 5 ppm and O<sub>2</sub> accuracy is less than 15%

**TABLE 2**  
**CYLINDER GAS AUDIT RESULTS**  
**UNIT 2**  
**Desert View Power**  
**December 14, 2020**

Parameter	Accuracy, % of Gas Value	Accuracy Acceptance Criteria	Difference From Gas Value, ppm	Difference Acceptance Criteria	Status*
SO <sub>2</sub> Low Range (mid span)	-10.0%	15%	-2.70	5 ppm	Pass
SO <sub>2</sub> Low range (low span)	-9.4%	15%	-1.18	5 ppm	Pass
NO <sub>x</sub> Low range (mid span)	1.9%	15%	1.04	5 ppm	Pass
NO <sub>x</sub> Low range (low span)	8.6%	15%	2.13	5 ppm	Pass
CO Low Range (mid span)	-0.4%	15%	-0.21	5 ppm	Pass
CO Low Range (low span)	5.2%	15%	1.31	5 ppm	Pass
O <sub>2</sub> (mid span)	-1.1%	15%	NA	NA	Pass
O <sub>2</sub> (low span)	-0.1%	15%	NA	NA	Pass
SO <sub>2</sub> High Range (mid span)	-1.6%	15%	-4.51	5 ppm	Pass
SO <sub>2</sub> High Range (low span)	2.9%	15%	3.61	5 ppm	Pass
NO <sub>x</sub> High Range (mid span)	1.0%	15%	2.87	5 ppm	Pass
NO <sub>x</sub> High Range (low span)	4.7%	15%	6.00	5 ppm	Pass
CO High Range (mid span)	1.1%	15%	3.04	5 ppm	Pass
CO High Range (low span)	7.4%	15%	9.12	5 ppm	Pass

\* Pass if accuracy less than 15% or within 5 ppm and O<sub>2</sub> accuracy is less than 15%

# CYLINDER GAS AUDIT WORK SHEET

Client: Desert View Power  
Location: Mecca

Unit No: 1  
Data By: DW

Date: 12/14/2020

## NORMAL RANGE

	NOx ppm		CO ppm		SO2 ppm		O2 %	
Reference Gas	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Concentration	24.7	55.5	25	55	12.5	27.1	5.07	9.51

Replicate								
1	25.78	55.26	23.59	52.59	12.33	24.88	5.11	9.47
2	26.30	55.31	23.51	52.96	12.30	24.85	5.11	9.36
3	26.26	56.15	23.24	52.78	12.30	25.19	5.09	9.49
Average	26.11	55.57	23.45	52.78	12.31	24.97	5.10	9.44
Difference, ppm	1.41	0.07	-1.55	-2.22	-0.19	-2.13	n/a	n/a
Accuracy	5.7%	0.1%	-6.2%	-4.0%	-1.5%	-7.8%	0.7%	-0.7%

Client: Desert View Power  
Location: Mecca  
Date: 12/14/2020

Unit No: 1  
Data By: DW

## HIGH RANGE

	NOx ppm		CO ppm		SO2 ppm	
Reference Gas	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Concentration	128.5	282	123.3	274	125	277.0

Replicate						
1	134.27	286.26	128.30	273.31	123.51	272.74
2	134.17	286.79	128.77	274.06	134.01	275.65
3	134.81	286.86	128.97	274.41	135.18	278.27
Average	134.42	286.64	128.68	273.93	130.90	275.55
Difference, ppm	5.92	4.64	5.38	-0.07	5.90	-1.45
Accuracy	4.6%	1.6%	4.4%	0.0%	4.7%	-0.5%

Client: Desert View Power  
Location: Mecca  
Date: 12/14/2020

Unit No: 2  
Data By: DW

# CYLINDER GAS AUDIT WORK SHEET

## NORMAL RANGE

	NOx ppm		CO ppm		SO2 ppm		O2 %	
Reference Gas	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Concentration	24.7	55.5	25	55	12.5	27.1	5.07	9.51
Replicate								
1	26.62	56.43	26.39	54.73	11.31	24.10	5.07	9.40
2	26.92	56.73	26.39	54.98	11.55	24.47	5.07	9.40
3	26.94	56.46	26.15	54.67	11.10	24.63	5.06	9.43
Average	26.83	56.54	26.31	54.79	11.32	24.40	5.07	9.41
Difference, ppm	2.13	1.04	1.31	-0.21	-1.18	-2.70	n/a	n/a
Accuracy	8.6%	1.9%	5.2%	-0.4%	-9.4%	-10.0%	-0.1%	-1.1%

Client: Desert View Power  
Location: Mecca  
Date: 12/14/2020

Unit No: 2  
Data By: DW

## HIGH RANGE

	NOx ppm		CO ppm		SO2 ppm	
Reference Gas	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Concentration	128.5	282	123.3	274	125	277.0
Replicate						
1	134.06	284.29	131.79	273.31	120.06	268.45
2	134.57	284.95	132.68	278.60	131.82	273.00
3	134.86	285.36	132.79	279.20	133.94	276.01
				279.31		
Average	134.50	284.87	132.42	277.04	128.61	272.49
Difference, ppm	6.00	2.87	9.12	3.04	3.61	-4.51
Accuracy	4.7%	1.0%	7.4%	1.1%	2.9%	-1.6%

Client: **Desert View Power**Location: **Mecca**Date: **8/21/2020**Unit No: **Boiler 1&2**Data By: **Dave Wonderly**

Instrument		NOx ppm Low Range		SO2 ppm Low Range		O2 %		CO ppm Low Range	
Range		100		50		25		100	
<b>Gas Specification</b>		Point 1	Point 2	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Min		20	50	20	50	4	8	20	50
Max		30	60	30	60	6	12	30	60
Units		% FS	% FS	% FS	% FS	% O2	% O2	% FS	% FS
<b>Gas Requirement</b>		ppm NOx	ppm NOx	ppm SO2	ppm SO2	% O2	% O2	ppm CO	ppm CO
Min		20	50	10	25	4	8	20	50
Max		30	60	15	30	6	12	30	60
Gas Used		24.7	55.5	12.5	27.1	4.92	9.51	25	55
% of Range		25%	56%	25%	54%	20%	38%	25%	55%
<b>Status</b>		OK	OK	OK	OK	OK	OK	OK	OK
Cylinder No.		CC499373	CC31709	CC499373	CC31709	CC267572	CC95736	CC499373	CC31709

Instrument		NOx ppm High Range		SO2 ppm High Range		CO ppm High Range	
Range		500		500		500	
<b>Gas Specification</b>		Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Min		20	50	20	50	20	50
Max		30	60	30	60	30	60
Units		% FS	% FS	% FS	% FS	% FS	% FS
<b>Gas Requirement</b>		ppm NOx	ppm NOx	ppm SO2	ppm SO2	ppm CO	ppm CO
Min		100	250	100	250	100	250
Max		150	300	150	300	150	300
Gas Used		128.5	282	125	277	123.3	274
% of Range		26%	56%	25%	55%	25%	55%
<b>Status</b>		OK	OK	OK	OK	OK	OK
Cylinder No.		CC74949	CC169801	CC74949	CC169801	CC74949	CC169801



Praxair  
5700 South Alameda Street  
Los Angeles, CA 90058  
Tel: (323) 585-2154 Fax: (714) 542-6689  
PGVPID: F22018

DocNumber: 000120028

# CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS



Montrose Air Quality Services, LLC  
1631 E. St. Andrew Pl.  
Santa Ana, CA 92705

Praxair Order Number: 70480156  
Customer P. O. Number:  
Customer Reference Number:

Fill Date: 1/29/2018  
Part Number: NI CO25MNS11EAS  
Lot Number: 70086802906  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

## Certified Concentration:

Expiration Date:	2/9/2021	NIST Traceable
Cylinder Number:	CC499373	Analytical Uncertainty:
25.0 ppm	CARBON MONOXIDE	± 0.8 %
24.7 ppm	NITRIC OXIDE	± 0.7 %
12.5 ppm	SULFUR DIOXIDE	± 1.7 %
Balance	NITROGEN	

NOx = 24.9 ppm

NOx for Reference Only

CO-25.0  
NO-24.7  
SO<sub>2</sub>-12.5  
CC499373  
Exp. 2/9/21  
F22018

Certification Information: Certification Date: 2/9/2018 Term: 36 Months Expiration Date: 2/9/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

## Analytical Data: (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

### 1. Component: CARBON MONOXIDE

Requested Concentration: 25 ppm  
Certified Concentration: 25.0 ppm  
Instrument Used: Horiba VIA-510 S/N 576876015  
Analytical Method: NDIR  
Last Multipoint Calibration: 1/15/2018

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: ALM-235595  
Ref. Std. Conc.: 25.3 ppm  
Ref. Std. Traceable to SRM #: 2635a  
SRM Sample #: 58-E-34  
SRM Cylinder #: FF10686

First Analysis Data:		Date:	2/2/2018
Z:	0	R:	25.2
R:	25.3	Z:	0
Z:	0	C:	25
R:	25.3	C:	25.033
UOM:	ppm	Mean Test Assay:	25 ppm

Second Analysis Data:		Date:	
Z:	0	R:	0
R:	0	Z:	0
Z:	0	C:	0
R:	0	C:	0
UOM:	ppm	Mean Test Assay:	0 ppm

### 2. Component: NITRIC OXIDE

Requested Concentration: 25 ppm  
Certified Concentration: 24.7 ppm  
Instrument Used: Thermo Electron 42i-LS S/N 1030645077  
Analytical Method: Chemiluminescence  
Last Multipoint Calibration: 1/12/2018

Reference Standard Type: SRM  
Ref. Std. Cylinder #: CC2852  
Ref. Std. Conc.: 51.00 ppm  
Ref. Std. Traceable to SRM #: 1683b  
SRM Sample #: 45-V-42  
SRM Cylinder #: CAL017897

First Analysis Data:		Date:	2/2/2018
Z:	0	R:	51
R:	51	Z:	0
Z:	0	C:	24.7
R:	51	C:	24.8
UOM:	ppm	Mean Test Assay:	24.767 ppm

Second Analysis Data:		Date:	2/9/2018
Z:	0	R:	51
R:	50.8	Z:	0
Z:	0	C:	24.6
R:	50.9	C:	24.548
UOM:	ppm	Mean Test Assay:	24.582 ppm

### 3. Component: SULFUR DIOXIDE

Requested Concentration: 12 ppm  
Certified Concentration: 12.5 ppm  
Instrument Used: Ametek 921CE S/N AW-921-S321  
Analytical Method: Ultraviolet Absorption  
Last Multipoint Calibration: 1/16/2018

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC423833  
Ref. Std. Conc.: 10.21 ppm  
Ref. Std. Traceable to SRM #: PRM#C1194  
SRM Sample #: C1194310  
SRM Cylinder #: D506172

First Analysis Data:		Date:	2/2/2018
Z:	0	R:	99.8
R:	101.6	Z:	0
Z:	0	C:	122.3
R:	101.3	C:	12.375
UOM:	ppm	Mean Test Assay:	12.416 ppm

Second Analysis Data:		Date:	2/9/2018
Z:	0	R:	101.5
R:	101.6	Z:	0
Z:	0	C:	124.3
R:	101.2	C:	12.512
UOM:	ppm	Mean Test Assay:	12.528 ppm

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

JP  
2-28-18



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PGVPID: F22018

DocNumber: 000120028

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Analyzed by:

Henry Koung  
Henry Koung

Certified by:

Amalia Real  
Amalia Real

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DocNumber: 000119815

## Praxair

5700 South Alameda Street

Los Angeles, CA 90058

Tel:(323)585-2154 Fax:(714)542-6689

PGVP ID: F22018

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS



## Montrose Air Quality Services, LLC

1631 E. St. Andrew Pl.

Santa Ana, CA 92705

Praxair Order Number: 70478952

Customer PO Number:

Customer Reference Number:

Fill Date: 1/25/2018

Part Number: NI CO275NS1E-AS

Lot Number: 70086802508

Cylinder Style and Outlet: AS CGA 660

Cylinder Pressure and Volume: 2000 psig 140 cu. ft.

## Certified Concentration:

Expiration Date:	02/05/2026	NIST Traceable
Cylinder Number:	CC169801	Expanded Uncertainty:
274 ppm	CARBON MONOXIDE	± 0.7 %
282 ppm	NITRIC OXIDE	± 0.3 %
277 ppm	SULFUR DIOXIDE	± 0.6 %
Balance	NITROGEN	

NOx ppm = 282 ppm

NOX for Reference Only

Certification Information: Certification Date: 2/5/2018 Term: 96 Months Expiration Date: 02/05/2026

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

## Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

## 1. Component:

## CARBON MONOXIDE

Requested Concentration: 275 ppm  
 Certified Concentration: 274 ppm  
 Instrument Used: HORIBA, VIA-S10 576 876 015  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 01/02/2018

First Analysis Data:		Date: 01/29/2015	
Z:	0	R:	248.5
R:	248.4	Z:	0
Z:	0	C:	274
UOM:	ppm	Mean Test Assay:	274 ppm

## Reference Standard Type:

GMIS

Ref. Std. Cylinder #:

CC243385

Ref. Std. Conc:

248.5 ppm

Ref. Std. traceable to SRM #:

2636a

SRM Sample #:

57-E-28

SRM Cylinder #:

FF23380

Second Analysis Data:		Date:	
Z:	0	R:	0
R:	0	Z:	0
Z:	0	C:	0
UOM:	ppm	Mean Test Assay:	0 ppm

## 2. Component:

## NITRIC OXIDE

Requested Concentration: 275 ppm  
 Certified Concentration: 282 ppm  
 Instrument Used: Thermo Electron 42i S/N 072602432C  
 Analytical Method: Chemiluminescence  
 Last Multipoint Calibration: 01/29/2018

First Analysis Data:		Date: 01/29/2018	
Z:	0	R:	253
R:	253	Z:	0
Z:	0	C:	284
UOM:	ppm	Mean Test Assay:	283 ppm

## Reference Standard Type:

GMIS

Ref. Std. Cylinder #:

CC2744

Ref. Std. Conc:

253.2 ppm

Ref. Std. traceable to SRM #:

1885b

SRM Sample #:

43-M-28

SRM Cylinder #:

FF20734

Second Analysis Data:		Date: 02/05/2018	
Z:	0	R:	253
R:	254	Z:	0
Z:	0	C:	282
UOM:	ppm	Mean Test Assay:	281 ppm

## 3. Component:

## SULFUR DIOXIDE

Requested Concentration: 275 ppm  
 Certified Concentration: 277 ppm  
 Instrument Used: HORIBA, VIA-S10, 5203551011  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 01/27/2018

First Analysis Data:		Date: 01/29/2018	
Z:	0	R:	495.4
R:	495.4	Z:	0
Z:	0	C:	276.6
UOM:	ppm	Mean Test Assay:	276 ppm

## Reference Standard Type:

GMIS

Ref. Std. Cylinder #:

CC121190

Ref. Std. Conc:

495.4 ppm

Ref. Std. traceable to SRM #:

1661a

SRM Sample #:

94-1-18

SRM Cylinder #:

FF23304

Second Analysis Data:		Date: 02/05/2018	
Z:	0	R:	495.4
R:	495.2	Z:	0
Z:	0	C:	276.6
UOM:	ppm	Mean Test Assay:	277 ppm

Analyzed by:

Leeanna Rodriguez

Certified by:

Quinn Hailes

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specified analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

Making Our Planet More Productive

AC 2-13-18



**Praxair**  
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 PGVP ID: F22018

DocNumber: 000119814

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Montrose Air Quality Services, LLC  
 1631 E. St. Andrew Pl.  
 Santa Ana, CA 92705

Praxair Order Number: 70478952  
 Customer PO Number:  
 Customer Reference Number:

Fill Date: 1/25/2018  
 Part Number: NI C0125NS4E-AS  
 Lot Number: 70086802507  
 Cylinder Style and Outlet: AS CGA 560  
 Cylinder Pressure and Volume: 2000 psig 140 cu. ft.

CO-123.3 ppm  
 NOX-128.5 ppm  
 SO2-125.0 ppm  
 CC74949  
 EXP-2-5-26  
 F22018

### Certified Concentration:

Expiration Date:	02/05/2026	NIST Traceable
Cylinder Number:	CC74949	Expanded Uncertainty:
123.3 ppm	CARBON MONOXIDE	± 0.4 %
128.5 ppm	NITRIC OXIDE	± 0.7 %
125 ppm	SULFUR DIOXIDE	± 1.0 %
Balance	NITROGEN	

NOx ppm = 128.5 ppm

NOX for Reference Only

**Certification Information:** Certification Date: 2/5/2018 Term: 96 Months Expiration Date: 02/05/2026

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.  
 Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component:

##### CARBON MONOXIDE

Requested Concentration: 125 ppm  
 Certified Concentration: 123.3 ppm  
 Instrument Used: HORIBA, VIA-510 576 876 015  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 01/02/2018

<b>First Analysis Data:</b>		<b>Date:</b> 01/29/2015	
Z:	0	R:	102.2
R:	102.3	Z:	0
Z:	0	C:	123.5
C:	123.5	R:	102.3
UOM:	ppm	Mean Test Assay:	123.3 ppm

#### Reference Standard Type:

GMIS

Ref. Std. Cylinder #: CC243560  
 Ref. Std. Conc: 102.2 ppm  
 Ref. Std. traceable to SRM #: 1679c  
 SRM Sample #: 3-1-45  
 SRM Cylinder #: FF28593

<b>Second Analysis Data:</b>		<b>Date:</b>	
Z:	0	R:	0
R:	0	Z:	0
Z:	0	C:	0
C:	0	R:	0
UOM:	ppm	Mean Test Assay:	0 ppm

#### 2. Component:

##### NITRIC OXIDE

Requested Concentration: 125 ppm  
 Certified Concentration: 128.5 ppm  
 Instrument Used: Thermo Electron 42i S/N 072602432C  
 Analytical Method: Chemiluminescence  
 Last Multipoint Calibration: 01/29/2018

<b>First Analysis Data:</b>		<b>Date:</b> 01/29/2018	
Z:	0	R:	100.4
R:	100.4	Z:	0
Z:	0	C:	128.3
C:	128.3	R:	100.4
UOM:	ppm	Mean Test Assay:	128.3 ppm

#### Reference Standard Type:

NTRM

Ref. Std. Cylinder #: CC336497  
 Ref. Std. Conc: 100.4 ppm  
 Ref. Std. traceable to SRM #: 1684b  
 SRM Sample #: 44-T-83  
 SRM Cylinder #: FF9258

<b>Second Analysis Data:</b>		<b>Date:</b> 02/05/2018	
Z:	0	R:	100.4
R:	100.3	Z:	0
Z:	0	C:	128.7
C:	128.7	R:	100.3
UOM:	ppm	Mean Test Assay:	128.8 ppm

#### 3. Component:

##### SULFUR DIOXIDE

Requested Concentration: 125 ppm  
 Certified Concentration: 125 ppm  
 Instrument Used: HORIBA, VIA-510, 5203551011  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 01/27/2018

<b>First Analysis Data:</b>		<b>Date:</b> 01/29/2018	
Z:	0	R:	95.2
R:	95.3	Z:	0
Z:	0	C:	125.4
C:	125.4	R:	95.3
UOM:	ppm	Mean Test Assay:	125.3 ppm

#### Reference Standard Type:

NTRM

Ref. Std. Cylinder #: SA15531  
 Ref. Std. Conc: 95.17 ppm  
 Ref. Std. traceable to SRM #: 120702  
 SRM Sample #: 12070204  
 SRM Cylinder #:

<b>Second Analysis Data:</b>		<b>Date:</b> 02/05/2018	
Z:	0	R:	95.2
R:	95.1	Z:	0
Z:	0	C:	124.7
C:	124.6	R:	95.1
UOM:	ppm	Mean Test Assay:	124.7 ppm

Analyzed by:

*Leeanna Rodriguez*  
 Leeanna Rodriguez

Certified by:

*Quinn Hailes*  
 Quinn Hailes

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specified analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc. arising out of the use of the information contained herein exceed the fee established for providing such information.

Making Our Planet More Productive

AC 2-13-18



**Praxair**  
 5700 South Alameda Street  
 Los Angeles, CA 90058  
 Tel: (323) 585-2154 Fax: (714) 542-6689  
 PGVPID: F22018

DocNumber: 000120030

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Montrose Air Quality Services, LLC**  
 1631 E. St. Andrew Pl.  
 Santa Ana, CA 92705

Praxair Order Number: 70480156  
 Customer P. O. Number:  
 Customer Reference Number:

Fill Date: 1/25/2018  
 Part Number: NI CO55MNS10EAS  
 Lot Number: 70086802503  
 Cylinder Style & Outlet: AS CGA 660  
 Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

Expiration Date:	2/7/2022	NIST Traceable
Cylinder Number:	CC31709	Analytical Uncertainty:
55.0 ppm	CARBON MONOXIDE	± 0.6 %
55.5 ppm	NITRIC OXIDE	± 0.7 %
27.1 ppm	SULFUR DIOXIDE	± 1 %
Balance	NITROGEN	

NOx = 55.6 ppm

NOx for Reference Only

CO- 55.0  
 NO- 55.5  
 SO<sub>2</sub>- 27.1  
 CC31709  
 Exp- 2/7/22  
 F22018

**Certification Information:** Certification Date: 2/7/2018 Term: 48 Months Expiration Date: 2/7/2022

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data: (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 55 ppm  
 Certified Concentration: 55.0 ppm  
 Instrument Used: Horiba VIA-510 S/N 576876015  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 1/15/2018

First Analysis Data:		Date: 1/31/2018	
Z: 0	R: 50.2	C: 55	Conc: 55
R: 50.4	Z: 0	C: 55.1	Conc: 55.1
Z: 0	C: 55	R: 50.3	Conc: 55
UOM: ppm	Mean Test Assay:	55.033 ppm	

Reference Standard Type: GMIS  
 Ref. Std. Cylinder #: CC186877  
 Ref. Std. Conc: 50.3 ppm  
 Ref. Std. Traceable to SRM #: 1678c  
 SRM Sample #: 04-I-41  
 SRM Cylinder #: FF18402

Second Analysis Data:		Date:	
Z: 0	R: 0	C: 0	Conc: 0
R: 0	Z: 0	C: 0	Conc: 0
Z: 0	C: 0	R: 0	Conc: 0
UOM: ppm	Mean Test Assay:	0 ppm	

#### 2. Component: NITRIC OXIDE

Requested Concentration: 55 ppm  
 Certified Concentration: 55.5 ppm  
 Instrument Used: Thermo Electron 42i-LS S/N 1030645077  
 Analytical Method: Chemiluminescence  
 Last Multipoint Calibration: 1/12/2018

First Analysis Data:		Date: 1/31/2018	
Z: 0	R: 51	C: 55.4	Conc: 55.4
R: 51	Z: 0	C: 55.5	Conc: 55.5
Z: 0	C: 55.5	R: 51	Conc: 55.5
UOM: ppm	Mean Test Assay:	55.467 ppm	

Reference Standard Type: SRM  
 Ref. Std. Cylinder #: CC2852  
 Ref. Std. Conc: 51.00 ppm  
 Ref. Std. Traceable to SRM #: 1683b  
 SRM Sample #: 45-V-42  
 SRM Cylinder #: CAL017897

Second Analysis Data:		Date: 2/7/2018	
Z: 0	R: 51	C: 55.5	Conc: 55.573
R: 50.9	Z: 0	C: 55.4	Conc: 55.473
Z: 0	C: 55.4	R: 50.9	Conc: 55.473
UOM: ppm	Mean Test Assay:	55.506 ppm	

#### 3. Component: SULFUR DIOXIDE

Requested Concentration: 27 ppm  
 Certified Concentration: 27.1 ppm  
 Instrument Used: Ametek 921CE S/N AW-921-S321  
 Analytical Method: Ultraviolet Absorption  
 Last Multipoint Calibration: 1/16/2018

First Analysis Data:		Date: 1/31/2018	
Z: 0	R: 48.6	C: 27.1	Conc: 27.052
R: 48.7	Z: 0	C: 27.3	Conc: 27.251
Z: 0	C: 27.2	R: 48.7	Conc: 27.152
UOM: ppm	Mean Test Assay:	27.152 ppm	

Reference Standard Type: NTRM  
 Ref. Std. Cylinder #: CC72598  
 Ref. Std. Conc: 48.58 ppm  
 Ref. Std. Traceable to SRM #: NTRM12070  
 SRM Sample #: JOB NO.16055  
 SRM Cylinder #: N/A

Second Analysis Data:		Date: 2/7/2018	
Z: 0	R: 48.9	C: 27.2	Conc: 27.04
R: 48.8	Z: 0	C: 27.2	Conc: 27.04
Z: 0	C: 27.2	R: 48.9	Conc: 27.04
UOM: ppm	Mean Test Assay:	27.04 ppm	

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

JED  
 2-26-18



Praxair  
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PGVPID: F22018

DocNumber: 000120030

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Analyzed by:

Henry Koung

Certified by:

Amalia Real

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.



Making our planet more productive

DocNumber: 306921



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Fax: 714-542-6689  
PGVP ID: F22020



1631 E. St Andrew Pl.  
Santa Ana, CA 92705

## OF ANALYSIS / EPA PROTOCOL GAS

Certificate Issuance Date: 05/28/2020

Praxair Order Number: 71323524

Part Number: EV NICDOXE53-AS

Customer PO Number: 79313858

Fill Date: 05/20/2020

Lot Number: 70066014101

Cylinder Style & Outlet: AS

CGA 580

Cylinder Pressure and Volume: 2000 psig 140 ft3

### Certified Concentration

Expiration Date:	05/28/2028	NIST Traceable
Cylinder Number:	CC267572	Expanded Uncertainty
10.20 %	Carbon dioxide	± 0.5 %
4.92 %	Oxygen	± 0.5 %
Balance	Nitrogen	

### ProSpec EZ Cert



### Certification Information:

Certification Date: 05/28/2020

Term: 96 Months

Expiration Date: 05/28/2028

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.

Do Not Use this Standard if Pressure is less than 100 PSIG.

CO2 responses have been corrected for Oxygen IR Broadening effect. O2 responses have been corrected for CO2 interference.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component:

Carbon dioxide

Requested Concentration: 10 %  
Certified Concentration: 10.20 %  
Instrument Used: Horiba VIA-510 S/N 20C194WK  
Analytical Method: NDIR  
Last Multipoint Calibration: 05/22/2020

First Analysis Data:				Date	05/28/2020
Z: 0	R: 16.02	C: 10.2	Conc: 10.2		
R: 16.03	Z: 0	C: 10.21	Conc: 10.21		
Z: 0	C: 10.21	R: 16.03	Conc: 10.21		
UOM: %	Mean Test Assay: 10.2 %				

#### Reference Standard:

Type / Cylinder #: GMIS / CC134179

Concentration / Uncertainty: 16.02 % ± 0.286 %

Expiration Date: 07/10/2022

Traceable to: SRM # / Sample # / Cylinder #: SRM 1675b / 6-F-51 / CAL014536

SRM Concentration / Uncertainty: 13.963 % / ± 0.034 %

SRM Expiration Date: 05/16/2022

Second Analysis Data:				Date	
Z: 0	R: 0	C: 0	Conc: 0		
R: 0	Z: 0	C: 0	Conc: 0		
Z: 0	C: 0	R: 0	Conc: 0		
UOM: %	Mean Test Assay: %				

#### 2. Component:

Oxygen

Requested Concentration: 5 %  
Certified Concentration: 4.92 %  
Instrument Used: OXYMAT 5E  
Analytical Method: Paramagnetic  
Last Multipoint Calibration: 05/22/2020

First Analysis Data:				Date	05/28/2020
Z: 0	R: 5	C: 4.92	Conc: 4.92		
R: 5	Z: 0	C: 4.92	Conc: 4.92		
Z: 0	C: 4.94	R: 5.01	Conc: 4.94		
UOM: %	Mean Test Assay: 4.92 %				

#### Reference Standard:

Type / Cylinder #: GMIS / CC138810

Concentration / Uncertainty: 5.00 % ± 0.234 %

Expiration Date: 12/14/2026

Traceable to: SRM # / Sample # / Cylinder #: SRM 2658a / 72-D-28 / CAL016862

SRM Concentration / Uncertainty: 9.918 % / ± 0.022 %

SRM Expiration Date: 02/03/2024

Second Analysis Data:				Date	
Z: 0	R: 0	C: 0	Conc: 0		
R: 0	Z: 0	C: 0	Conc: 0		
Z: 0	C: 0	R: 0	Conc: 0		
UOM: %	Mean Test Assay: %				

Analyzed By

Jose Vasquez

Certified By

Nelson Ma

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

LU 6/30/20

1631 E. St Andrew Pl.  
Santa Ana, CA 92705

1545 E EDINGER AVE  
SANTA ANA, CA 92705



Praxair Distribution, Inc.  
5700 S. Alameda Street  
Los Angeles CA 90058  
Tel: 323-585-2154  
Fax: 714-542-6689  
PGVP ID: F22018

## E OF ANALYSIS / EPA PROTOCOL GAS

Certificate Modification Date: 09/13/2018

Fill Date: 09/07/2018

Praxair Order Number: 70710636

Lot Number: 70086825002

Part Number: NI CD1905E-AS

Cylinder Style & Outlet: AS

CGA 590

Cylinder Pressure and Volume: 2000 psig 140 ft3

*Handwritten:*  
60 18.99%  
O2 9.51%  
CO2 18.99%  
CC95736  
9/13/26  
F22018

Expiration Date:	09/13/2026	NIST Traceable
Cylinder Number:	CC95736	Expanded Uncertainty
18.99 %	Carbon dioxide	± 0.3 %
9.51 %	Oxygen	± 0.4 %
Balance	Nitrogen	

ProSpec EZ Cert



### Certification Information:

Certification Date: 09/13/2018

Term: 96 Months

Expiration Date: 09/13/2026

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.

Do Not Use this Standard if Pressure is less than 100 PSIG.

CO2 responses have been corrected for Oxygen IR Broadening effect. O2 responses have been corrected for CO2 interference.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. **Component:** Carbon dioxide  
Requested Concentration: 19 %  
Certified Concentration: 18.99 %  
Instrument Used: Horiba VIA-510 S/N 20C194WK  
Analytical Method: NDIR  
Last Multipoint Calibration: 08/20/2018

**Reference Standard:** Type / Cylinder #: GMIS / CC187238  
Concentration / Uncertainty: 20.10 % ± 0.24 %  
Expiration Date: 08/07/2026  
**Traceable to:** SRM # / Sample # / Cylinder #: RGM#CC193512 / N/A / RGM#CC193512  
SRM Concentration / Uncertainty: 28.99 % / ± 0.05 %  
SRM Expiration Date: 05/15/2023

<b>First Analysis Data:</b>	<b>Date</b>	09/13/2018
Z: 0	R: 20.1	C: 18.99
R: 20.1	Z: 0	C: 19
Z: 0	C: 19	R: 20.11
UOM: %	Mean Test Assay:	18.99 %

<b>Second Analysis Data:</b>	<b>Date</b>	
Z: 0	R: 0	C: 0
R: 0	Z: 0	C: 0
Z: 0	C: 0	R: 0
UOM: %	Mean Test Assay:	%

2. **Component:** Oxygen  
Requested Concentration: 9.5 %  
Certified Concentration: 9.51 %  
Instrument Used: OXYMAT 5E  
Analytical Method: Paramagnetic  
Last Multipoint Calibration: 09/04/2018

**Reference Standard:** Type / Cylinder #: NTRM / DT0010402  
Concentration / Uncertainty: 9.88 % ± 0.4 %  
Expiration Date: 11/18/2022  
**Traceable to:** SRM # / Sample # / Cylinder #: NTRM #170701 / N/A / NTRM #DT0010402  
SRM Concentration / Uncertainty: 9.875 % / ± 0.040 %  
SRM Expiration Date: 11/18/2022

<b>First Analysis Data:</b>	<b>Date</b>	09/13/2018
Z: 0	R: 9.88	C: 9.52
R: 9.88	Z: 0	C: 9.51
Z: 0	C: 9.52	R: 9.89
UOM: %	Mean Test Assay:	9.51 %

<b>Second Analysis Data:</b>	<b>Date</b>	
Z: 0	R: 0	C: 0
R: 0	Z: 0	C: 0
Z: 0	C: 0	R: 0
UOM: %	Mean Test Assay:	%

Analyzed By

Jose Vasquez

Certified By

Danielle Burns

*Handwritten:* SS 8/30/19

# CYLINDER GAS AUDIT WORK SHEET

CeDAR 1-Minute Data

Data for 8/21/2020 3:33 PM thru 8/21/2020 4:45 PM

Timestamp	(Boiler 1) NOx ppm	(Boiler 1) SO2 ppm	(Boiler 1) CO ppm	(Boiler 1) O2% 1-	(Boiler 2) NOx ppm	(Boiler 2) SO2 ppm	(Boiler 2) CO ppm	(Boiler 2) O2% 1-
	1-Min	1-Min	1-Min	Min	1-Min	1-Min	1-Min	Min
8/21/2020 15:37	54.83	22.84	52.9	0.02	56.32	24.46	55.33	0.04
8/21/2020 15:38	54.99	23.81	53.1	0.01	56.56	25.1	55.43	0.03
8/21/2020 15:39	55.34	24.5	53.12	0	56.27	25.3	55.47	0.03
8/21/2020 15:40	45.04	21.25	42.93	0	44.38	20.82	43.59	0.04
8/21/2020 15:41	25.56	12.73	23.28	0	25.96	12.79	25.6	0.03
8/21/2020 15:42	25.42	11.65	23.09	0	25.33	12.33	25.59	0.03
8/21/2020 15:43	25.07	11.11	22.99	0	25.55	11.99	25.56	0.02
8/21/2020 15:44	36.03	14.47	33.71	0	38.78	16.87	38.13	0.02
8/21/2020 15:45	54.63	23	52.62	0	56.22	24.6	55.16	0.02
8/21/2020 15:46	54.8	24.15	52.67	0	56.44	25.22	55.23	0.02
8/21/2020 15:47	54.92	24.63	52.76	0	56.14	25.45	55.28	0.02
8/21/2020 15:48	47.26	22.17	44.41	0	46.26	21.88	45.3	0.01
8/21/2020 15:49	25.43	13.21	22.93	0	25.88	13.04	25.47	0.01
8/21/2020 15:50	25.08	11.68	22.59	0	25.46	12.5	25.34	0.01
8/21/2020 15:51	25.17	11.27	22.48	0	25.82	12.15	25.31	0.01
8/21/2020 15:52	33.07	13.6	30.3	0	34.65	15.88	34.85	0.01
8/21/2020 15:53	54.49	22.81	51.97	0	55.99	24.57	54.94	0.01
8/21/2020 15:54	54.99	24.13	52.16	0	56.07	25.07	54.96	0.01
8/21/2020 15:55	54.5	24.54	52.16	0	56.59	25.18	55.02	0.01
8/21/2020 15:56	47.57	22.21	44.39	0	46.53	22.06	45.73	0.01
8/21/2020 15:57	25.59	13.14	22.47	0	25.74	12.92	25.27	0.01
8/21/2020 15:58	25.16	11.8	22.14	0	25.09	12.32	25.13	0.01
8/21/2020 15:59	24.95	11.43	22.05	0	25.52	12.04	25.11	0.01
8/21/2020 16:00	58.19	41.61	55.71	0	67.94	53.28	65.72	0
8/21/2020 16:01	128.68	114.32	123.71	0	133.39	117.64	127.42	0.01
8/21/2020 16:02	129.25	121.95	124.44	0	133.94	121.59	127.74	0.01
8/21/2020 16:03	129.39	124.13	124.55	0	134.06	123.27	127.76	0.01
8/21/2020 16:04	158.76	155.25	153.03	0	172.78	165.4	166	0.02
8/21/2020 16:05	281.09	261.73	270.59	0	289.62	265.7	276.48	0.01
8/21/2020 16:06	283.39	272.56	272.09	0	286.83	267.33	273.36	0.07
8/21/2020 16:07	283.36	275.76	272.46	0	291.09	274.34	277.56	0.02
8/21/2020 16:08	243.19	237.61	233.14	0	240.13	224.83	228.46	0.01
8/21/2020 16:09	131.54	140.91	125.88	0	135.66	135.27	129.07	0.01
8/21/2020 16:10	130.66	132.97	124.93	0	134.84	131.67	128.54	0.01
8/21/2020 16:11	130.12	130.54	125	0	134.67	130.52	128.54	0.01
8/21/2020 16:12	170.41	168.98	164.13	0	185.7	181.47	177.13	0.01
8/21/2020 16:13	282.85	267.11	271.6	0	290.44	272.38	277.25	0.02
8/21/2020 16:14	283.66	275.25	272.51	0	291.01	276.29	277.75	0.02
8/21/2020 16:15	284	278.02	272.76	0	291.2	277.72	277.78	0.02
8/21/2020 16:16	246.28	241.19	235.88	0	242.66	229.05	231.09	0.01
8/21/2020 16:17	131.66	142.24	126.32	0	135.89	137.47	129.34	0.01

# **CYLINDER GAS AUDIT**

## **WORK SHEET**

8/21/2020 16:18	130.47	133.85	125.48	0	135.32	133.41	128.75	0.01
8/21/2020 16:19	130.65	131.14	125.2	0	132.5	129.81	126.56	0.58
8/21/2020 16:20	170.24	170.08	164.06	0	183.34	181.96	175.31	0.05
8/21/2020 16:21	283.06	267.97	272.08	0	290.61	273.26	277.48	0.02
8/21/2020 16:22	283.96	276.12	272.99	0	291.62	277.49	278.05	0.02
8/21/2020 16:23	284.15	278.9	273.22	0	291.42	278.69	278.2	0.02
8/21/2020 16:24	214.47	213.81	204.08	2.31	203.06	190.92	192.58	2.55
8/21/2020 16:25	5.48	31.95	1.96	4.84	4.12	20.11	3.31	4.86
8/21/2020 16:26	2.83	14.08	0	4.86	2.14	12.27	1.93	4.87
8/21/2020 16:27	2.66	8.76	0	6.82	2.43	9.48	2.17	6.95
8/21/2020 16:28	3.02	6.36	0.67	9.45	3.13	8.03	2.92	9.43
8/21/2020 16:29	3.43	4.79	0.7	9.46	2.87	6.62	2.95	9.44
8/21/2020 16:30	2.84	3.82	0.27	7.42	2.34	5.43	2.42	7.23
8/21/2020 16:31	1.73	2.66	0	4.9	2	4.28	1.58	4.9
8/21/2020 16:32	1.63	2.2	0	4.89	1.59	3.7	1.43	4.89
8/21/2020 16:33	1.95	2.06	0	6.93	1.91	3.39	1.67	7.06
8/21/2020 16:34	2.22	2.19	0.24	9.46	2.21	3.07	2.55	9.44
8/21/2020 16:35	2.64	1.88	0.21	9.48	2.27	2.8	2.53	9.45
8/21/2020 16:36	2.12	1.51	0.09	7.49	2.05	2.24	2.29	7.29
8/21/2020 16:37	1.85	1.05	0	4.92	1.75	1.91	1.29	4.91
8/21/2020 16:38	1.63	1.24	0	4.9	1.26	1.48	1.39	4.9
8/21/2020 16:39	1.8	1.23	0	6.85	1.54	1.54	1.49	7.01
8/21/2020 16:40	2.5	1.34	0.14	9.47	2.16	1.57	2.43	9.45
8/21/2020 16:41	2.46	1.3	0.12	9.49	1.99	1.44	2.51	9.46
8/21/2020 16:42	2.52	1.11	0.21	9.49	2.16	1.33	2.47	9.47
8/21/2020 16:43	2.33	1.12	0.12	9.49	2.08	1.22	2.44	9.47



## **THIS IS THE LAST PAGE OF THIS DOCUMENT**

If you have any questions, please contact one of the following individuals by email or phone.

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Name: Mr. Matt McCune  
Title: Regional Vice President  
Region: West  
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